Form HWM-004
3/87

N. JERSEY DEPARTMENT OF ENVIRONMENTAL P.. TECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
5th Fl., 401 E. State St., Trenton, N.J. 08625

NOTICE OF VIOLATION

ID NO. NJD064362379 DATE May 2, 1988

NAME OF FACILITY Decorating Resources Inc

LOCATION OF FACILITY 430 Andboro Drive, Pitman, NJ

NAME OF OPERATOR Eric Neaves - Director of Research

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION NJAC 7:26-9.3 - Accumulation of Haz. Waste Containers for Greater Than 90 Days. Refers To Daum Dated 1-25-88 on Pad. NJAC 7:26-9.4 (d)6 - Container Storage Area not inspected Daily. NJAC 7:26-9.4 (g)6iii - No written description of Training Since 1985. NJAC 7:26-9.6 (d) 1 - No immediate access to communications or alarm during handling of Haz. Waste - Refers To Clean out Rooms

Remedial action to correct these violations must be initiated immediately and be completed by May 16, 1988. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Jack Cole
Investigator, Division of Waste Management
Department of Environmental Protection

To 5/24/88

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Color Dec.

U.S. EPA I.D. No.: NJD064362379

Street: Andrea Drive

City: Pitman **State:** N.J. **Zip Code:** 08071

Telephone: (609) 589-3800

Operator: Same

Street:

City: **State:** **Zip Code:**

Telephone:

Owner: Decorating Resources, Inc.

Street: 430 Andrea Drive

City: Pitman **State:** NJ **Zip Code:** 08071

Telephone: (609) 589-3800

Inspection Date: 5/2/88 **Time:** 1130 - 1630 **Weather Conditions:** Clear / Cool

	Name	Affiliation	Telephone
Inspectors:	J Allen	NJDEP	(609) 346-8000
	J Sanderson, T Moy - USEPA/II		(201) 264-6154
Facility Representatives:	Eric Nerves - Dir. of Research		
	W Brian Anderson - President		

	RCRA Status	LDR Status: F-Solvent	LDR Status: California List
Generator -	Small Quantity	X	X
Transporter			
Treater			
Storer			
Disposer			

INSPECTION SUMMARY

COLOR DEC QUALIFIES AS AN EXEMPT SMALL QUANTITY GENERATOR UNDER E.P.A. REGULATIONS. THE HAZARDOUS WASTE GENERATED IS FROM AN ON-SITE SOLUENT RECLAIMATION UNIT. METHYL ETHYL KETONE IS USE FOR IT'S SOLUENT PURPOSES TO CLEAN VARIOUS PARTS OF THE PRINTING PRESSES. THE SPENT SOLUENT IS THAN RECLAIMED USING A SMALL STILL OPERATING AS A BATCH OPERATION. THIS APPEARS TO FALL INTO THE CLASSIFICATION OF F-005. BASED ON THE LAB ANALYSIS FOR THIS WASTE STREAM (SEE ATTATCHMENT A-1) THE CADMIUM CONTENT WOULD ALSO MAKE THIS MATERIAL A "CALIFORNIA WASTE." UP TO AND INCLUDING THE LAST SHIPMENT, THIS WASTESTREAM WAS IDENTIFIED AS D-001. THE POSSABILITY EXISTS THAT THIS MATERIAL MAY HAVE BEEN MISCLASSIFIED. THE STILL BOTTOMS MAY AT TIMES CONTAIN TRACES OF N-PROPYLACETATE, INK AND PAINT SLUDGES DUE TO THE PRESENCE OF THESE MATERIALS IN THE PRESS INK-PANS WHEN THEY ARE CLEANED. RECORDS (MANIFESTS, GENERATOR REPORTS, AND DRUM PAD INVENTORY) SHOWED COLOR DEC SHIPPING OFF SITE 40 DRUMS (OR LESS) OF HAZ. WASTE PER YEAR, FROM 1986 THRU THIS INSPECTION DATE.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes** (Note: Small Quantity)					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005 - Still Bottoms From The Distillation of Spent Mek.	X	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. **California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	X - See Attatchment A-1	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L n/a

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 n/a

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to n/a

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No __X__ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L n/a

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste? - FACILITY HAS BEEN DISPOSING OF MFC AS D-001.

   ____ Yes ____ No __X__ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No __X__ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No __X__ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes __X__ No ____ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, note how this is adequate: _____

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ____ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No __X__ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No __X__ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ___x___ NA

If yes, note how this is adequate: _____

- Testing

____ Yes ____ No ____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes ____ No ___x___ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ___x___ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

____ Yes _X_ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

_X_ Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

____ Yes _X_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	_X_ No
Applicable treatment standards	____ Yes	_X_ No
Manifest number	____ Yes	_X_ No
Waste analysis data, if available	____ Yes	_X_ No

Identify off-site treatment or storage facilities: DELAWARE CONTAINER CORP, PA.

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes _X_ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

_____

_____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No __X__ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes - N/A
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____ No

If yes, list types of waste treatment units and processes:

_____

_____

(19) 5/24/88

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
carbon tetrachloride	___Yes	___No
chlorinated fluorocarbons	___Yes	___No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
chlorobenzene	___Yes	___No
trichlorofluoromethane	___Yes	___No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	___No
ortho-dichlorobenzene	___Yes	___No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	___Yes	___No
acetone	___Yes	___No
ethyl acetate	___Yes	___No
ethyl benzene	___Yes	___No
ethyl ether	___Yes	___No
methyl isobutyl ketone	___Yes	___No
n-butyl alcohol	___Yes	___No
cyclohexanone	___Yes	___No
methanol	___Yes	___No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

___Yes ___No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	___No
nitrobenzene	___Yes	___No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	___Yes	___No
methyl ethyl ketone	___Yes	___No
carbon disulfide	___Yes	___No
isobutanol	___Yes	___No
pyridine	___Yes	___No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

___Yes ___No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?

___Yes ___No

If yes, list the constituents.

METHYL ETHYL KETONE

_____

(c) Are the constituents used as diluents?

___Yes ___No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?

___Yes ___No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

___Yes ___/No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

___Yes ___/No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

___/Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)